

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Case Number: 04-10246-PBS

FILED
IN CLERKS OFFICE

2004 OCT 15 P 1:20

U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA)

v.)

BRIAN TODD and)
SHAUN TODD)

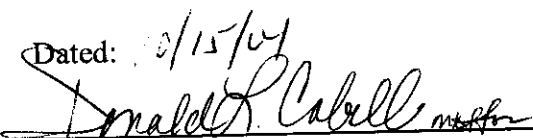
JOINT MEMORANDUM PURSUANT TO L.R. 116.5(A)

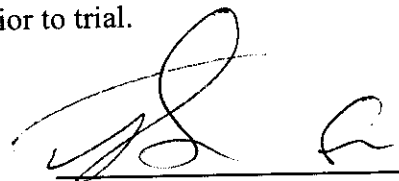
NOW COME the parties and hereby submit the within Joint Memorandum pursuant to L.R. 116.5 (A).

1. L.R. 116.5 (A)(1): The parties do not anticipate seeking any relief from the applicable timing requirements of L.R. 116.3, but would reserve their right to do so if the need arises.
2. L.R. 116.5 (A)(2): The parties agree to expert disclosure of government experts on or before November 30, 2004 and reciprocal discovery by the defense on or before December 30, 2004.
3. L.R. 116.5 (A)(3): Unknown at this time. The parties reserve the right to amend this response upon completion of discovery.
4. L.R. 116.5 (A)(4): Not at this time, but the parties reserve the right to amend this response.
5. L.R. 116.5 (A)(5): No periods of excludable delay should be ordered at this time.
6. L.R. 116.5(A)(6): A trial is anticipated; it should last 3 full days.

7. L.R. 116:5(A)(7): A Final Status Conference should be established approximately thirty (30) days prior to trial.

Dated: 10/15/04


Donald L. Cabell, Assistant US Attorney
UNITED STATES ATTORNEY'S OFFICE
Suite 9200, 1 Courthouse Way
Boston, MA 02201
(617) 748-3105


Scott F. Gleason, Esquire
GLEASON LAW OFFICES, P.C.
163 Merrimack Street
Haverhill, MA 01830
(978) 521-4044